

EXHIBIT 9

In the Matter Of:

Re: Google Antitrust Investigation

DAN TAYLOR

September 17, 2021



1 2 3 In Re: Google Antitrust Investigation 4 5 6 ***HIGHLY CONFIDENTIAL*** 7 8 DEPOSITION OF DAN TAYLOR 9 10 11 12 13 DATE: September 17, 2021 14 TIME: 11:04 a.m. 15 PLACE: ***REMOTE*** 16 BEFORE: Rebecca Schaumloffel, RPR, CCR-NJ 17 JOB NO: 2021-810872 18 19 20 21 22 23 24 25	1 2 3 APPEARANCES (continued): 4 5 6 ALSO PRESENT: 7 Tor Winston, DOJ economist 8 Gordon Ahl, DOJ paralegal 9 Shaudy Danaye-Armstrong, Esq., Google 10 Kevin Montgomery, videographer 11 12 * * * 13 14 15 16 17 18 19 20 21 22 23 24 25
1 2 APPEARANCES: 3 4 5 U.S. DEPARTMENT OF JUSTICE Antitrust Division 6 450 5th Street, N.W. Washington, DC 20001 7 BY: ANDREW SCHUPANITZ, ESQ. PATRICIA SINDEL, ESQ. 8 9 10 11 12 FRESHFIELDS BRUCKHAUS DERINGER US LLP Attorneys for Google 13 701 Pennsylvania Avenue NW Suite 600 Washington, DC 20004 14 BY: JAN RYBNICEK, ESQ. NATHAN HEMBREE, ESQ. 15 16 17 18 19 AXINN VELTROP & HARKRIDER Attorneys for Google 20 560 Mission Street San Francisco, California 94105 BY: DAVID PEARL, ESQ. 21 22 23 24 25	1 D. TAYLOR 2 THE VIDEOGRAPHER: Good morning. 3 We are now on the record. Today's 4 date is September 17, 2021, and the 5 time is 11:04am Eastern Daylight Time. 6 This is the video deposition of Dan 7 Taylor, In Re: Google Antitrust 8 Investigation. This deposition is taking 9 place via web video conference with 10 all participants attending remotely. 11 My name is Kevin Montgomery and 12 I'm the videographer representing 13 Lexitas. All present will be noted on 14 the stenographic record. Our Court 15 Reporter today is Rebecca Schaumloffel 16 representing Lexitas. The Court 17 Reporter will now swear in the 18 witness. 19 20 21 DAN TAYLOR, called as a witness, having been 22 first duly sworn by a Notary Public of the 23 States of New York, New Jersey, and 24 Pennsylvania was examined and testified as 25 follows:

<p style="text-align: right;">5</p> <p>1 D. TAYLOR</p> <p>2 EXAMINATION BY</p> <p>3 MR. SCHUPANITZ:</p> <p>4 Q. Good morning, everyone. Good</p> <p>5 morning, Mr. Taylor.</p> <p>6 A. Good morning.</p> <p>7 Q. My name is Andrew Schupanitz with</p> <p>8 the Antitrust Division of the United States</p> <p>9 Department of Justice. I'm joined today by</p> <p>10 my colleagues, Patricia Sindel, Tor Winston,</p> <p>11 and Gordon Ahl. And can I have counsel for</p> <p>12 Google please identify themselves for the</p> <p>13 record as well?</p> <p>14 MR. RYBNICEK: I'm Jan Rybnicek</p> <p>15 from Freshfields Bruckhaus Deringer on</p> <p>16 behalf of Google and the witness.</p> <p>17 With me is my colleague, Nate Hembree,</p> <p>18 also from Freshfields. With me from</p> <p>19 Google is Shaudy Danaye-Armstrong, and</p> <p>20 also with me from the law firm Axinn</p> <p>21 is David Pearl.</p> <p>22 MR. SCHUPANITZ: Counsel, do you</p> <p>23 also represent Mr. Taylor for this</p> <p>24 deposition?</p> <p>25 MR. RYBNICEK: Yes.</p>	<p style="text-align: right;">7</p> <p>1 D. TAYLOR</p> <p>2 We will do our best today to take</p> <p>3 breaks at regular intervals, but if at any</p> <p>4 point you need to take a break, you need to</p> <p>5 use the bathroom or get something to eat,</p> <p>6 please just let me know, and we can find an</p> <p>7 appropriate place to pause.</p> <p>8 You are not permitted to</p> <p>9 communicate with others or consult documents</p> <p>10 or notes while we're on the record. When we</p> <p>11 are taking a break and not on the record, you</p> <p>12 can communicate with third parties; for</p> <p>13 instance, you can check work emails or text</p> <p>14 family members, but you should not discuss</p> <p>15 today's deposition with third parties.</p> <p>16 Does that make sense?</p> <p>17 A. Yes.</p> <p>18 Q. We will review some documents</p> <p>19 during today's deposition. So we will share</p> <p>20 those with you electronically in the chat and</p> <p>21 give you time to review them. For longer</p> <p>22 documents, I will direct you to the specific</p> <p>23 sections about which I will be asking</p> <p>24 questions.</p> <p>25 You are under oath today and sworn</p>
<p style="text-align: right;">6</p> <p>1 D. TAYLOR</p> <p>2 BY MR. SCHUPANITZ:</p> <p>3 Q. Mr. Taylor, thank you for</p> <p>4 appearing today. If you could please just</p> <p>5 state and spell your full name for the</p> <p>6 record?</p> <p>7 A. Yes. Daniel Patrick Taylor.</p> <p>8 Spelling that, D-A-N-I-E-L, P-A-T-R-I-C-K,</p> <p>9 T-A-Y-L-O-R.</p> <p>10 Q. It is an easy question to start</p> <p>11 with. Have you ever been deposed before?</p> <p>12 A. I have not.</p> <p>13 Q. So as you know, we are conducting</p> <p>14 this deposition virtually pursuant to rules</p> <p>15 agreed by the parties. So if there is</p> <p>16 technical issues, we will take a break, and</p> <p>17 we will do our best to resolve those off the</p> <p>18 record.</p> <p>19 You are permitted to consult with</p> <p>20 your attorneys today if needed during the</p> <p>21 deposition. If you need to do so, please</p> <p>22 just request a break, and we can go off the</p> <p>23 record and then you can meet privately with</p> <p>24 counsel in a virtual breakout room that has</p> <p>25 been set up for you.</p>	<p style="text-align: right;">8</p> <p>1 D. TAYLOR</p> <p>2 to tell the truth as if you were testifying</p> <p>3 in court.</p> <p>4 Do you understand that?</p> <p>5 A. Yes.</p> <p>6 Q. For the sake of the Court</p> <p>7 Reporter, we both need to speak loudly and</p> <p>8 clearly and slow enough. Fast talking is</p> <p>9 something that I do, and I have to try to</p> <p>10 avoid during these. So please wait until I</p> <p>11 finish a question before answering so we</p> <p>12 don't speak over each other, and I will try</p> <p>13 to do the same for you when you're answering</p> <p>14 a question.</p> <p>15 If a question calls for a yes or</p> <p>16 no response please answer with an actual</p> <p>17 "yes" or a "no" instead of something like a</p> <p>18 nod or "yeah" or "um-hum." Those are hard to</p> <p>19 capture on the transcripts.</p> <p>20 Does that make sense?</p> <p>21 A. Yes.</p> <p>22 Q. When I'm asking you questions, I</p> <p>23 don't want you to speculate, but if you can</p> <p>24 provide a reasonable estimate in response to</p> <p>25 a question, please do so. So to take an</p>

<p style="text-align: right;">13</p> <p>1 D. TAYLOR</p> <p>2 obstruction of this investigation is a</p> <p>3 criminal offense under 18 U.S.C. Section</p> <p>4 1505?</p> <p>5 A. Yes.</p> <p>6 Q. Okay. If you can just turn to</p> <p>7 page 2, the second page of the exhibit. So</p> <p>8 this is 18 U.S.C Section 1505, "Obstruction</p> <p>9 of proceedings before departments, agencies,</p> <p>10 and committees."</p> <p>11 So if you haven't had a chance to</p> <p>12 read that, I'll let you do that now, and if</p> <p>13 you can just let me know when you've read it.</p> <p>14 A. Okay. I've read it, and I</p> <p>15 understand it.</p> <p>16 Q. Do you have any questions about</p> <p>17 anything contained in this Civil</p> <p>18 Investigative Demand?</p> <p>19 A. Let me take a minute to read the</p> <p>20 first page.</p> <p>21 Q. Sure.</p> <p>22 A. Okay, I've read it. The only</p> <p>23 comment that I have is that it references the</p> <p>24 1st day of September, and today is the 17th,</p> <p>25 but other than that, I understand it fully.</p>	<p style="text-align: right;">15</p> <p>1 D. TAYLOR</p> <p>2 business?</p> <p>3 A. Yes.</p> <p>4 Q. Okay. What aspects were those?</p> <p>5 A. There was a way that I talk about</p> <p>6 audience targeting within our display</p> <p>7 advertising products, and I wanted to make</p> <p>8 sure that I -- the way that I explained this</p> <p>9 to customers was in fact accurate in case it</p> <p>10 became a conversation today.</p> <p>11 Q. Did you review any documents in</p> <p>12 preparation for this deposition?</p> <p>13 A. None other than provided with</p> <p>14 counsel.</p> <p>15 Q. Okay. Did any of those documents</p> <p>16 refresh your recollection as to any fact?</p> <p>17 A. No.</p> <p>18 Q. Did you review deposition</p> <p>19 transcripts or summaries of deposition</p> <p>20 transcripts from other people in this</p> <p>21 investigation?</p> <p>22 A. No.</p> <p>23 Q. Okay. So turning a little bit to</p> <p>24 your actual work at Google, I'll start off by</p> <p>25 asking, what software do you use in</p>
<p style="text-align: right;">14</p> <p>1 D. TAYLOR</p> <p>2 Q. Okay. That's a good catch. Those</p> <p>3 dates often get moved, but that is,</p> <p>4 nonetheless, a good catch. You can put that</p> <p>5 aside. We are done with the CID.</p> <p>6 Did you meet with anyone in</p> <p>7 person, by video conference, over the phone</p> <p>8 or otherwise, to prepare for this deposition?</p> <p>9 A. Yes.</p> <p>10 Q. Who is that?</p> <p>11 A. I met with legal counsel to</p> <p>12 prepare for this deposition. I also had a --</p> <p>13 Q. I'm sorry, go ahead.</p> <p>14 A. I also had a short meeting with a</p> <p>15 colleague, not in the context of this</p> <p>16 deposition, but to understand a certain</p> <p>17 aspect of our business before coming to this</p> <p>18 deposition.</p> <p>19 Q. Okay. So put that aside for a</p> <p>20 second. Did you meet with -- other than with</p> <p>21 counsel and this one meeting you just</p> <p>22 mentioned, did you meet with anyone else?</p> <p>23 A. No, I did not.</p> <p>24 Q. Okay. You said that other meeting</p> <p>25 was to understand certain aspects of the</p>	<p style="text-align: right;">16</p> <p>1 D. TAYLOR</p> <p>2 connection with your work?</p> <p>3 A. Google Workspace, which is</p> <p>4 formerly known as G Suite, and I use Mac</p> <p>5 operating system for a laptop, and I use an</p> <p>6 Android operating system for my mobile phone,</p> <p>7 and I use a Chrome operating system for a</p> <p>8 video conference software.</p> <p>9 Q. And you mentioned Workspace. Is</p> <p>10 Gmail included in that?</p> <p>11 A. It is.</p> <p>12 Q. And Hangouts?</p> <p>13 A. Hangouts, Chat, Meet, yes.</p> <p>14 Q. Okay. So you mentioned Chat, do</p> <p>15 you use the Chat in connection with your work</p> <p>16 at Google?</p> <p>17 A. I do.</p> <p>18 Q. Do you know what On the Record</p> <p>19 Chat is?</p> <p>20 A. Yes, I do.</p> <p>21 Q. Can you explain that for me?</p> <p>22 A. So in Chat, as I understand it,</p> <p>23 when I use it with my corporate account,</p> <p>24 history is turned off by default, but you can</p> <p>25 turn it on on an individual conversation</p>

<p style="text-align: right;">17</p> <p>1 D. TAYLOR</p> <p>2 basis.</p> <p>3 Q. What does it mean for a chat to be</p> <p>4 on or off the record?</p> <p>5 A. A chat that is -- where history is</p> <p>6 off means the messages are deleted after</p> <p>7 24 hours.</p> <p>8 Q. Okay.</p> <p>9 A. And then I can't see them anymore.</p> <p>10 Q. Do you turn the record or history</p> <p>11 on when you use the chat function?</p> <p>12 A. Not as a habit, no.</p> <p>13 Q. Okay. But you have in certain</p> <p>14 instances?</p> <p>15 A. I have in certain instances as I</p> <p>16 have been advised to, yes.</p> <p>17 Q. Do you know approximately how</p> <p>18 often you put chats on the record?</p> <p>19 A. Not very often.</p> <p>20 Q. Could you estimate as, sort of, a</p> <p>21 percentage of your chats, how many of them</p> <p>22 are on the record?</p> <p>23 A. I can estimate under 10%.</p> <p>24 Q. Okay. Okay. Do you remember --</p> <p>25 the ones that you have marked as on the</p>	<p style="text-align: right;">19</p> <p>1 D. TAYLOR</p> <p>2 externally they might have, kind of,</p> <p>3 different titles and functions?</p> <p>4 A. That's correct.</p> <p>5 Q. So would others at Google -- I</p> <p>6 guess, how would others at Google describe</p> <p>7 your position then?</p> <p>8 A. They would describe my position as</p> <p>9 Vice President of Global Ads.</p> <p>10 Q. Okay. When did you start in that</p> <p>11 role?</p> <p>12 A. I achieved the role of Vice</p> <p>13 President in May of 2021.</p> <p>14 Q. And we will come back to that role</p> <p>15 in a bit. What was your position before you</p> <p>16 became Vice President for Global Ads?</p> <p>17 A. I was Managing Director of Global</p> <p>18 Ads. So, specifically, my specific job</p> <p>19 duties did not materially change. I was just</p> <p>20 promoted within the same function.</p> <p>21 Q. Okay. So did your</p> <p>22 responsibilities expand in any way or it</p> <p>23 really is just, kind of, a higher level of</p> <p>24 management?</p> <p>25 A. It's primarily a higher level of</p>
<p style="text-align: right;">18</p> <p>1 D. TAYLOR</p> <p>2 record, do you remember any, kind of,</p> <p>3 specific instances?</p> <p>4 A. I do not.</p> <p>5 Q. What is your current position at</p> <p>6 Google?</p> <p>7 A. Vice President of Sales.</p> <p>8 Externally on business cards and so on, I use</p> <p>9 the title Vice President of Global Ads.</p> <p>10 Q. That was going to be my follow-up</p> <p>11 question because I think I had seen global</p> <p>12 ads. Are those -- so sales and global ads,</p> <p>13 are those functionally the same thing?</p> <p>14 A. Not necessarily. So the Vice</p> <p>15 President of Sales is a, you know, internal</p> <p>16 HR designation for people that are within my</p> <p>17 organization at a certain level. Typically,</p> <p>18 externally, we try to have more descriptive</p> <p>19 titles that reflect the specific work we do,</p> <p>20 and VP of Sales would be pretty generic to</p> <p>21 use for everyone that's in this -- everyone</p> <p>22 in this organization at that level.</p> <p>23 Q. I see. Okay. So would it be fair</p> <p>24 to say that internally there are a number of</p> <p>25 vice presidents of sales even though</p>	<p style="text-align: right;">20</p> <p>1 D. TAYLOR</p> <p>2 management.</p> <p>3 Q. Okay. You said that role was</p> <p>4 Managing Director of Global Ads?</p> <p>5 A. Yes, sir.</p> <p>6 Q. Is that also -- or have you also</p> <p>7 been called Managing Director of Global</p> <p>8 Programatic Display?</p> <p>9 A. Yes.</p> <p>10 Q. Is this another case where there</p> <p>11 is a, sort of, internal designation and a</p> <p>12 more, kind of, descriptive title?</p> <p>13 A. Yes, I think that is true. So,</p> <p>14 internally, my title, you know, within HR</p> <p>15 records, etc. was probably Managing Director</p> <p>16 of Sales. Again, not very descriptive to</p> <p>17 customers and partners.</p> <p>18 Q. When did you start in the Managing</p> <p>19 Director role?</p> <p>20 A. Similarly to what I had just</p> <p>21 described with regard to promotion to Vice</p> <p>22 President, I was promoted to Managing</p> <p>23 Director in 2015.</p> <p>24 Q. And what was your role before</p> <p>25 that?</p>

Highly Confidential

Dan Taylor - September 17, 2021

<div style="text-align: right; font-weight: bold;">249</div> <p>1 D. TAYLOR</p> <p>2 highly confidential.</p> <p>3 MR. SCHUPANITZ: I think -- I'll</p> <p>4 say thank you, Mr. Taylor, and then we</p> <p>5 can go off record.</p> <p>6 THE VIDEOGRAPHER: Madam Court</p> <p>7 Reporter, anything for the group</p> <p>8 before we end the call?</p> <p>9 THE COURT REPORTER: No.</p> <p>10 THE VIDEOGRAPHER: This marks</p> <p>11 the end of today's deposition of Dan</p> <p>12 Taylor. The time is 5:44 p.m., and we</p> <p>13 are going off the record.</p> <p>14 (Whereupon, at 5:44 p.m., the</p> <p>15 Examination of this Witness was</p> <p>16 concluded.)</p> <p>17</p> <p>18</p> <p>19 _____</p> <p>20 DAN TAYLOR</p> <p>21 Subscribed and sworn to before me</p> <p>22 this ____ day of _____, 2021.</p> <p>23</p> <p>24</p> <p>25</p> <p>26 _____</p> <p>27 NOTARY PUBLIC</p>	<div style="text-align: right; font-weight: bold;">251</div> <p>1</p> <p>2 C E R T I F I C A T E</p> <p>3</p> <p>4 STATE OF NEW YORK)</p> <p>5 : SS.:</p> <p>6 COUNTY OF NASSAU)</p> <p>7</p> <p>8 I, REBECCA SCHAUMLOFFEL, a Notary</p> <p>9 Public for and within the State of New York,</p> <p>10 do hereby certify:</p> <p>11 That the witness whose examination</p> <p>12 is hereinbefore set forth was duly sworn and</p> <p>13 that such examination is a true record of the</p> <p>14 testimony given by that witness.</p> <p>15 I further certify that I am not</p> <p>16 related to any of the parties to this action</p> <p>17 by blood or by marriage and that I am in no</p> <p>18 way interested in the outcome of this matter.</p> <p>19 IN WITNESS WHEREOF, I have hereunto</p> <p>20 set my hand this 20th day of September, 2021.</p> <p>21 <i>Rebecca Schaumloffel</i></p> <p>22 REBECCA SCHAUMLOFFEL</p> <p>23</p> <p>24</p> <p>25</p>																																																																													
<div style="text-align: right; font-weight: bold;">250</div> <p>1</p> <p>2 E X H I B I T S</p> <p>3</p> <p>4</p> <table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">EXHIBIT</th> <th style="text-align: left;">EXHIBIT</th> <th style="text-align: left;">PAGE</th> </tr> <tr> <th style="text-align: left;">NUMBER</th> <th style="text-align: left;">DESCRIPTION</th> <th></th> </tr> </thead> <tbody> <tr> <td>Exhibit 1</td> <td>Civil Investigative Demand 30757</td> <td>11</td> </tr> <tr> <td>Exhibit 2</td> <td>GOOG-DOJ-06259371 through '6259375</td> <td>138</td> </tr> <tr> <td>Exhibit 3</td> <td>GOOG-DOJ-AT-00212946</td> <td>225</td> </tr> <tr> <td>Exhibit 4</td> <td>GOOG-DOJ-AT-01843288 through '01843289</td> <td>232</td> </tr> </tbody> </table> <p>17 I N D E X</p> <table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">EXAMINATION BY</th> <th style="text-align: left;">PAGE</th> </tr> </thead> <tbody> <tr> <td>MR. SCHUPANITZ</td> <td>5</td> </tr> </tbody> </table> <p>25</p>	EXHIBIT	EXHIBIT	PAGE	NUMBER	DESCRIPTION		Exhibit 1	Civil Investigative Demand 30757	11	Exhibit 2	GOOG-DOJ-06259371 through '6259375	138	Exhibit 3	GOOG-DOJ-AT-00212946	225	Exhibit 4	GOOG-DOJ-AT-01843288 through '01843289	232	EXAMINATION BY	PAGE	MR. SCHUPANITZ	5	<div style="text-align: right; font-weight: bold;">252</div> <p>1 ERRATA SHEET FOR THE TRANSCRIPT OF:</p> <p>2 Case Name: In Re: Google</p> <p>3 Dep. Date: September 17, 2021</p> <p>4 Deponent: Dan Taylor</p> <p>5 CORRECTIONS:</p> <table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">Pg.</th> <th style="text-align: left;">Ln.</th> <th style="text-align: left;">Now Reads</th> <th style="text-align: left;">Should Read</th> <th style="text-align: left;">Reason</th> </tr> </thead> <tbody> <tr><td>7</td><td>—</td><td>—</td><td>—</td><td>—</td></tr> <tr><td>8</td><td>—</td><td>—</td><td>—</td><td>—</td></tr> <tr><td>9</td><td>—</td><td>—</td><td>—</td><td>—</td></tr> <tr><td>10</td><td>—</td><td>—</td><td>—</td><td>—</td></tr> <tr><td>11</td><td>—</td><td>—</td><td>—</td><td>—</td></tr> <tr><td>12</td><td>—</td><td>—</td><td>—</td><td>—</td></tr> <tr><td>13</td><td>—</td><td>—</td><td>—</td><td>—</td></tr> <tr><td>14</td><td>—</td><td>—</td><td>—</td><td>—</td></tr> <tr><td>15</td><td>—</td><td>—</td><td>—</td><td>—</td></tr> <tr><td>16</td><td>—</td><td>—</td><td>—</td><td>—</td></tr> </tbody> </table> <p>17 _____</p> <p>18 Signature of Deponent</p> <p>19</p> <p>20 SUBSCRIBED AND SWORN BEFORE ME</p> <p>21 THIS ____ DAY OF _____, 2021.</p> <p>22</p> <p>23 _____</p> <p>24 (Notary Public) MY COMMISSION EXPIRES: _____</p> <p>25</p>	Pg.	Ln.	Now Reads	Should Read	Reason	7	—	—	—	—	8	—	—	—	—	9	—	—	—	—	10	—	—	—	—	11	—	—	—	—	12	—	—	—	—	13	—	—	—	—	14	—	—	—	—	15	—	—	—	—	16	—	—	—	—
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